

COOLEY LLP  
 BOBBY GHAJAR (198719)  
 (bghajar@cooley.com)  
 COLETTE GHAZARIAN (322235)  
 (cghazarian@cooley.com)  
 1333 2nd Street, Suite 400  
 Santa Monica, California 90401  
 Telephone: (310) 883-6400  
 MARK WEINSTEIN (193043)  
 (mweinstein@cooley.com)  
 KATHLEEN HARTNETT (314267)  
 (khartnett@cooley.com)  
 JUDD LAUTER (290945)  
 (jlauter@cooley.com)  
 ELIZABETH L. STAMESHKIN (260865)  
 (lstameshkin@cooley.com)  
 3175 Hanover Street  
 Palo Alto, CA 94304-1130  
 Telephone: (650) 843-5000

CLEARY GOTTlieb STEEN & HAMILTON LLP  
 ANGELA L. DUNNING (212047)  
 (adunning@cgsh.com)  
 1841 Page Mill Road, Suite 250  
 Palo Alto, CA 94304  
 Telephone: (650) 815-4131

*Counsel for Defendant Meta Platforms, Inc.*

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

RICHARD KADREY, *et al.*,  
 Individual and Representative Plaintiffs,  
 v.  
 META PLATFORMS, INC., a Delaware  
 corporation;  
 Defendant.

Case No. 3:23-cv-03417-VC

**STIPULATION AND ~~PROPOSED~~ ORDER RE  
 SCHEDULE**

Pursuant to the Court's order dated October 4, 2024 (ECF No. 211) and Civ. L.R. 7-12, Plaintiffs Richard Kadrey, Sarah Silverman, Christopher Golden, Jacqueline Woodson, Andrew Sean Greer, Rachel Louise Snyder, David Henry Hwang, Ta-Nehisi Coates, Laura Lippman, Matthew Klam, Junot Díaz and Lysa Terkeurst ("Plaintiffs"); and Defendant Meta Platforms, Inc. ("Defendant;" together with Plaintiffs, "Parties") by and through their respective counsel stipulate to the following:

WHEREAS, on October 4, 2024, the Court set a new fact discovery deadline of December 13, 2024, and a hearing on dispositive motions with respect to the named Plaintiffs' claims for May 1, 2025;

WHEREAS, the Court ordered the Parties to meet and confer and file a stipulation as to surrounding dates;

WHEREAS the Parties met and conferred and agreed upon the following deadlines;

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and through Plaintiffs and Defendant, as represented by their undersigned counsel, the following schedule is hereby agreed to and proposed to the Court:

Case Event	Date
Meet and Confer re: Existing Written Discovery	October 16, 2024
Serve Additional Written Discovery Requests	October 18, 2024
Exchange Supplemental Initial Disclosures	October 21, 2024
Letter Briefs re: Existing Written Discovery	October 23, 2024
Close of Fact Discovery	December 13, 2024 (Set by the Court)
Opening Expert Reports Due	January 10, 2025
Rebuttal Expert Reports Due	February 3, 2025

Close of Expert Discovery	February 26, 2025
Opening Summary Judgment and <i>Daubert</i> Briefs Due	March 7, 2025
Oppositions to Summary Judgment and <i>Daubert</i> Briefs Due	April 3, 2025
Replies in Support of Summary Judgment and <i>Daubert</i> Briefs Due	April 17, 2025
Hearing on Summary Judgment Motions	May 1, 2025 (Set by the Court)

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Dated: October 11, 2024

Respectfully Submitted,

By: /s/ Kathleen R. Hartnett

By: /s/ David Boies

Bobby A. Ghajar  
Colette Ani Ghazarian  
**COOLEY LLP**  
1333 2nd Street, Suite 400  
Santa Monica, CA 90401  
Telephone: (310) 883-6400  
Facsimile: (310) 883-6500  
Email: bghajar@cooley.com  
cghazarian@cooley.com

David Boies (pro hac vice)  
David L. Simons (pro hac vice)  
**BOIES SCHILLER FLEXNER LLP**  
55 Hudson Yards, 20th Floor  
New York, NY 10001  
(914) 749-8200  
dboies@bsfllp.com  
dsimons@bsfllp.com

Mark R. Weinstein  
Elizabeth Lee Stameshkin  
**COOLEY LLP**  
3175 Hanover Street  
Palo Alto, CA 94304  
Telephone: 650-843-5000  
Facsimile: 650-849-7400  
Email: mweinstein@cooley.com  
Email: lstameshkin@cooley.com

Maxwell V. Pritt (SBN 253155)  
Joshua I. Schiller (SBN 330653)  
Joshua M. Stein (SBN 298856)  
44 Montgomery Street, 41st Floor  
San Francisco, CA 94104  
(415) 293-6800  
mpritt@bsfllp.com  
jischiller@bsfllp.com  
jstein@bsfllp.com

Kathleen R. Hartnett  
Judd D. Lauter  
**COOLEY LLP**  
3 Embarcadero Center, 20th Floor  
San Francisco, CA 94111-4004  
Telephone: (415) 693-2071  
Facsimile: (415) 693-2222  
Email: khartnett@cooley.com

Jesse Panuccio (pro hac vice)  
1401 New York Ave, NW  
Washington, DC 20005  
(202) 237-2727  
jpanuccio@bsfllp.com

Angela Dunning  
**CLEARY GOTTlieb STEEN &  
HAMILTON LLP**  
1841 Page Mill Road, Suite 250  
Palo Alto, CA 94304-1248  
Telephone: (650) 815-4131  
Email: adunning@cgsh.com

Joseph R. Saveri (State Bar No. 130064)  
Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
Holden Benon (State Bar No. 325847)  
Aaron Cera (State Bar No. 351163)  
**JOSEPH SAVERI LAW FIRM, LLP**  
601 California Street, Suite 1505  
San Francisco, California 94108  
Telephone: (415) 500-6800  
Facsimile: (415) 395-9940  
Email: jsaveri@saverilawfirm.com  
czirpoli@saverilawfirm.com  
cyoung@saverilawfirm.com  
hbenon@saverilawfirm.com  
acera@saverilawfirm.com

*Attorneys for Defendant*

*META PLATFORMS, INC.*

Amy Keller (pro hac vice)  
James A. Ulwick (pro hac vice)

1 Nada Djordjevic (*pro hac vice*)  
2 **DICELLO LEVITT LLP**  
3 10 North Dearborn St., Sixth Floor  
4 Chicago, Illinois 60602  
5 Telephone: (312) 214-7900  
6 akeller@dicellolevitt.com  
7 julwick@dicellolevitt.com  
8 ndjordjevic@dicellolevitt.com

9 David A. Straite (*pro hac vice*)  
10 **DICELLO LEVITT LLP**  
11 485 Lexington Ave., Suite 1000  
12 New York, NY 10017  
13 Telephone: (646) 933-1000  
14 dstraite@dicellolevitt.com

15 Matthew Butterick (State Bar No. 250953)  
16 1920 Hillhurst Avenue, 406  
17 Los Angeles, CA 90027  
18 Telephone: (323) 968-2632  
19 Facsimile: (415) 395-9940  
20 Email: mb@buttericklaw.com

21 Bryan L. Clobes (*pro hac vice*)  
22 Alexander J. Sweatman (*pro hac vice anticipated*)  
23 **CAFFERTY CLOBES MERIWETHER**  
24 **& SPRENGEL LLP**  
25 135 South LaSalle Street, Suite 3210  
26 Chicago, IL 60603  
27 Telephone: (215) 864-2800  
28 Email: bclobes@caffertyclobes.com  
asweatman@caffertyclobes.com

Daniel Jerome Muller  
**VENTURA HERSEY & MULLER, LLP**  
1506 Hamilton Avenue  
San Jose, CA 95125  
Telephone: (408) 512-3022  
Facsimile: (408) 512-3023  
Email: dmuller@venturahersey.com  
*Counsel for Individual and Representative  
Plaintiffs and the Proposed Class*

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**PROPOSED ORDER**

Pursuant to stipulation of the Parties, **IT IS SO ORDERED.**

DATED: October 24, 2024

  
\_\_\_\_\_  
HON. VINCE CHHABRIA  
United States District Judge